

EXHIBIT 1

Declaration of Kathleen Shea

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Appearing Pro Hac Vice

Attorneys for Defendants
Wyndham Vacation Ownership, Inc.
and Demetrius Barnes-Vaughn

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CHRISTINA JORDAN,
Plaintiff,

vs.

WYNDHAM VACATION OWNERSHIP,
INC., a Nevada corporation; DEMETRIUS
BARNES, an individual; DOES I through X,
inclusive; and ROE BUSINESS ENTITIES, I
through X, inclusive

Defendants.

Consolidated for Discovery
Case No. 2:21-cv-02228-CDS-NJK

**DECLARATION OF KATHLEEN SHEA
IN SUPPORT OF DEFENDANTS' REPLY
IN SUPPORT OF DEFENDANTS' (1)
MOTION TO COMPEL MENTAL
EXAMINATION OF WENDY REGGE;
AND (2) MOTION TO CONTINUE
REBUTTAL EXPERT DISCLOSURE
DEADLINE**

WENDY REGGE,
Plaintiff,

vs.

WYNDHAM VACATION OWNERSHIP,
INC., *et al.*,

Defendants.

Case No. 2:21-cv-02235-JCM-EJY

RENEE DEAN,
Plaintiff,

vs.

WYNDHAM VACATION OWNERSHIP,
INC., *et al.*,

Defendants.

Case No. 2:22-cv-00141-GMN-NJK

1 I, KATHLEEN C. SHEA, declare as follows:

2 I am an attorney licensed to practice law in the Florida, am appearing in this case *Pro Hac*
3 *Vice*, and am currently an Associate with the law firm of Jackson Lewis, P.C., and counsel for
4 Defendants Wyndham Vacation Ownership, Inc. (“Wyndham”) and Demetrius Barnes-Vaughn
5 (“Barnes-Vaughn” and collectively as “Defendants”) in the above-captioned litigation. Except as
6 to those matters stated upon information and belief, I have personal knowledge of the facts set forth
7 below in this declaration and will so testify if called upon.

8 1. I submit this declaration in support of Defendants’ Reply in Support of Defendants’
9 (1) Motion to Compel Mental Examination of Plaintiff Wendy Regge (“Plaintiff”) and (2) Motion
10 to Continue Rebuttal Expert Disclosure Deadline.

11 2. On November 1, 2023, I had a conferral call with Plaintiff’s counsel to discuss
12 Plaintiff’s request that Defendants supplement their discovery responses. During the call, I asked
13 Plaintiff’s counsel whether she had the opportunity to review the draft proposed stipulation for a
14 Rule 35 exam of Plaintiff Regge to be conducted by Dr. JoAnn Behrman-Lippert, Ph.D. (“Dr.
15 Lippert”).

16 3. Plaintiff’s counsel responded that she would further review the stipulation but
17 Plaintiff might object to the exam.

18 4. On November 3, 2023, I received an email from Plaintiff’s counsel which advised
19 that Plaintiff Regge did not agree to the proposed Rule 35 exam.

20 5. This was the first time that Plaintiff indicated that she would object to a Rule 35
21 exam.

22 6. I certify that the Motion is brought in the good faith, zealous representation of my
23 clients, and it not for the purposes of bad faith, delay, or harassment.

24 I declare under penalty of perjury under 28 U.S.C. § 1746, that the foregoing is true and
25 correct.

26 EXECUTED this 1st day of December 2023.

27 /s/ Kathleen Shea
28 KATHLEEN C. SHEA